

Exhibit C

Rein Tech's Previous Counsel's Email Regarding  
Defendant Discovery Issues

From: Peter Corcoran  
Sent: Sunday, September 10, 2023 5:01 PM  
To: Bryan DeMatteo <bdenmatteo@laylorenenglish.com>  
Cc: Timothy Devlin <tdevlin@devlinlawfirm.com>; Todd E. Jones, Esq. <tjones@laylorenenglish.com>; Coby Nixon <cnixon@laylorenenglish.com>; Seth Trimble <strimble@laylorenenglish.com>; Cory Mull <cmull@laylorenenglish.com>; Kenneth L. Dorsney <KDorsney@morisjames.com>; Cordan S. Hitch <CHitch@morisjames.com>; pmazur@devlinlawfirm.com  
Subject: RE: Rein Tech v. Mueller; Production of Documents re Document Request No. 2

Bryan,

Attached find Rein Tech's requests for production of documents 6-15.

Further regarding your email below from July 31, you say that to date Mueller hasn't sold and/or installed any 420 RDMs with a LoRaWAN or Cellular Nodes, so that Mueller's sales of these components is \$0. This makes no sense. Rein Tech has provided exhibits in its first and second amended complaints and its initial and final infringement contentions showing that the 420 RDM is designed to be packaged with either a LoRaWAN or Cellular Node. The 420 RDM is useless without one of these nodes. It cannot communicate with Mueller's Mi.Net network and Sentryx servers without them. Rein Tech's initial and final infringement contentions make this clear. Mueller's answers to interrogatory nos. 4, 5, and 8 also make this clear.

You also have not followed-up with answering interrogatory 2, or any interrogatory answers, as you said you would, and no one from Mueller has attested to your interrogatory answers as required under Rule 33. All of your interrogatory answers state that your investigation of the interrogatories and review of documents is incomplete and ongoing and that you will update your interrogatory answers and production of documents. Please update all interrogatory answers and produce all documents relied upon for answering the interrogatories as requested under RFP 3. Please provide a date certain for the updated answers and production. They are overdue.

Best regards,

Peter Corcoran

Peter J. Corcoran, III, Esq., M.S., LL.M.  
CORCORAN IP LAW PLLC  
4142 McKnight Road  
Texarkana, Texas 75503  
Phone: (903) 701-2481  
Fax: (903) 560-4979

[WWW.CORCORANIP.COM](http://WWW.CORCORANIP.COM)

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